

# EXHIBIT A

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO  
individually and on behalf of all other  
similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 5:20-cv-03664-LHK-SVK

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS ONSITE ACCESS TO  
INTERNAL GOOGLE TOOLS AND  
DATA**

**[PROPOSED] ORDER**

Before the Court is Plaintiffs' request for Google to provide Plaintiffs' attorneys and experts with certain onsite access to internal Google tools and data.

Having considered Plaintiffs' request, and good cause having been shown, the Court **ORDERS** as follows:

By May 27, 2021, Google will permit Plaintiffs' attorneys and experts onsite access to a clean room in which Plaintiffs' attorneys and experts will be permitted to access and use internal Google tools, logs, and data for purposes of identifying the authenticated and unauthenticated data concerning the named plaintiffs and their devices. Plaintiffs' attorneys and experts will be granted access to and use of the following tools and data:

1. The search tool shown in GOOG-BRWN-00028290;
2. Any logs, databases, or other data structures containing data and information concerning the named plaintiffs, their devices, and/or their browsers, whether authenticated or unauthenticated;
3. Any additional tools or data necessary for purposes of identifying the authenticated and unauthenticated identifiers tied to the named plaintiffs, their devices, and/or their browsers.

1 Google will make these tools and data available at a location of Google's choosing. Google  
2 may supervise Plaintiffs' attorneys and experts' access to and use of these tools and data.

3 Google will also in advance provide Plaintiffs' attorneys and experts with documents  
4 sufficient to guide their use of the tools and data, including documents that describe the data format  
5 and fields.

6 Any access to Google tools and data and any information derived therefrom will be subject  
7 to the terms of the parties' Stipulated Protective Order (Dkt. No. 81).

8 This relief will not prevent or otherwise exclude Plaintiffs from seeking further relief  
9 related to Request for Production Nos. 10 and 18 (Disputes P6 and P3) upon a showing of good  
10 cause.

11 **IT IS SO ORDERED.**

12  
13 DATED: \_\_\_\_\_

14 Honorable Susan van Keulen  
15 United States Magistrate Judge  
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**[GOOGLE PROPOSED] ORDER  
DENYING PLAINTIFFS' ONSITE  
ACCESS TO INTERNAL GOOGLE  
TOOLS AND DATA**

Referral: Hon. Susan van Keulen, USMJ

**[GOOGLE PROPOSED] ORDER**

Before the Court is Plaintiffs' request for Google to provide Plaintiffs' attorneys and experts with certain onsite access to Google's internal system and raw data. Having considered the parties' papers filed in support and in opposition to Plaintiffs' request, the Court hereby **DENIES** Plaintiffs' request.

**THEREFORE, IT IS ORDERED** that Plaintiffs' request to access Google's internal systems and raw data is **DENIED**.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. SUSAN VAN KEULEN  
United States Magistrate Judge